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**MEMORANDUM ENDORSED**

**VIA ECF ONLY**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**RE: *United States v. Santos (Joan Mercedes)*, 22-cr-522 (GHW)**

Dear Judge Woods:

I represent Joan Mercedes, and I am writing to respectfully request that Your Honor modify his bail conditions from home incarceration to a curfew (still with location monitoring) where PTS would determine the curfew hours.

Last week, PTS updated me on Mr. Mercedes. PTS said that he has been reporting weekly, testing negative for marijuana, and that there have not been any problems with his location monitoring. PTS is encouraging Mr. Mercedes to enroll in STRIVE, a training program that prepares people for jobs that require OSHA certifications such as flagging. The next STRIVE program starts this week. I also understand that Mr. Mercedes has a job interview this week to help deliver food and beverages. This modification is necessary for Mr. Mercedes to participate in STIVE or to accept the job offer. The AUSAs' position is that they defer to PTS.

Thank you for your consideration.

Respectfully submitted,




Jill R. Shellow

cc: AUSA Andrew Jones (by ECF and email)  
AUSA Ashley Nicholas (by ECF and email)  
Pretrial Officer Francesca Piperato (by email)  
Joan Mercedes (by email)

Application denied without prejudice to renewal. This letter states that pretrial services supports Mr. Mercedes's enrollment in the STRIVE program. The letter does not expressly state that pretrial services supports the proposed modification at this time, however. The letter states that the next STRIVE program was to begin the week of the request, but does not state that Mr. Mercedes was enrolled in the program. The Court requests further clarification regarding the position of pretrial services regarding the requested modification of the defendant's conditions of pretrial release as well as further information regarding the timing for the defendant's participation in the STRIVE program and the defendant's ability to participate in the program under his current conditions of pretrial release.

SO ORDERED.

Dated: November 15, 2023  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge